

May 21, 1985

Site: West Lake AF
ID # M50799/0932
Break: 10.0
Other: CU 2
5-21-85

Mr. James Gunn
 Stilar & Heitzmann
 Attorneys at Law
 515 Olive Street
 St. Louis, MO 63101

RE: Application for Operating Permit - Proposed West Lake Sanitary Landfill, St. Louis County.

Dear Mr. Gunn:

Following our meeting on May 20, I discussed the application with my staff. The following are general statements of the issues which have not been adequately addressed thus far. A comment letter to the engineer explaining these statements and requiring a detailed response is presently being prepared by the Waste Management Program.

1. Infiltration of leachate from previously filled areas and of groundwater from the northeast wall of the proposed area - Although efforts have been made to minimize groundwater inflow, it has not been determined that these efforts are permanent solutions. Therefore, the engineering report and plans must provide details and provisions for long term financing, maintenance, and administration of the leachate and gas collection systems. Without long term maintenance the site poses an unacceptably high potential for environmental harm. There are also several other related issues regarding leachate production which must be resolved.
2. A minimum of one leachate collection point and observation well will be required in each of the previously filled quarries.
3. The submitted design does not provide a positive seal above elevation 400 (MSL). Therefore, a positive draining interface should be constructed along the quarry walls above elevation 400 (MSL).
4. The design should include provisions to remove final cover from old fill areas which are to be covered with additional waste.
5. Details are needed concerning the proposed method of access to the working face, especially in inclement weather.
6. Details concerning the suitability of the soils to be used to construct the designated soil pads should be provided.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

P.O. Box 1368 Jefferson City, Missouri 65102

John D. Ashcroft Governor

DRN 0183

40249175



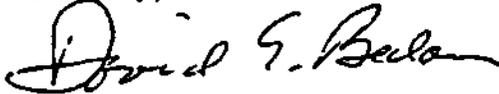
SUPERFUND RECORDS

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7. Adequate provisions for the continued availability of substitute equipment should be provided.
8. Given the longevity of the fill, an operating manual describing daily tasks and fill progression should be provided and made available to all present and future employees.
9. The engineering report and plan sheets should be revised to reflect any and all changes.

If you have any further questions please contact me at (314)
741-3241.

Sincerely,



David E. Bedan, Ph.D.
Director
Waste Management Program

DEB:MP:lh

cc: Mr. Ron Kucera, Deputy Director, DNR